

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 05-CV-30135-KPN

STACEY QUINONES,)
Plaintiff)
)
vs.)
)
TOWN OF HOLLAND, HOLLAND POLICE)
DEPARTMENT, CHIEF KEVIN GLEASON,)
RAY MOREHOUSE AND EARL JOHNSON,)
Defendants)

JOINT MOTION OF THE PARTIES
TO CONTINUE THE CASE MANAGEMENT CONFERENCE
AND FOR AN EXTENSION OF THE DISCOVERY ORDER

The parties in the above matter jointly and respectfully move this Court to continue the status conference scheduled for Tuesday, June 20, 2006 and for an order extending all of the deadlines in the original discovery order in this case for 90 days. The new deadlines would be as follows:

1. All written discovery and non-expert depositions completed by September 18, 2006;
2. Case Management Conference to be held on September 22, 2006.

As grounds for this motion, the parties state that the plaintiff's attorney is suffering from a serious medical condition which has rendered her unable to complete discovery. Plaintiff's counsel is prepared to provide medical records concerning her condition, if necessary. The parties anticipate that discovery can be completed by September 18, 2006.

THE PLAINTIFF
STACEY QUINONES

THE DEFENDANTS
TOWN OF HOLLAND, ET. AL.

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